

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of

Joint Application by SBC Communications  
Inc., Illinois Bell Telephone Company  
Incorporated, Indiana Bell Telephone Company  
Incorporated, The Ohio Bell Telephone Company,  
Wisconsin Bell, Inc. and Southwestern Bell  
Communications Services, Inc. for Provision of  
In-Region, InterLATA Services in Illinois,  
Indiana, Ohio, and Wisconsin

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WC Docket No. 03-167

**JOINT DECLARATION  
OF SARAH DeYOUNG  
AND WALTER W. WILLARD  
ON BEHALF OF AT&T CORP.**

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**JOINT DECLARATION OF SARAH DeYOUNG  
AND WALTER W. WILLARD  
ON BEHALF OF AT&T CORP.**

1. My name is Sarah DeYoung. I am Division Manager -- Local Services for AT&T's SBC Local Services and Access Management ("LSAM") Organization. In my position, I am responsible for the business relationship with SBC Communications Inc. ("SBC") as it relates to supporting AT&T's plans for entering the local telephone service market. Those responsibilities include negotiating with Ameritech, Southwestern Bell Telephone Company ("SWBT"), Pacific Bell ("Pacific"), and Southern New England Telephone ("SNET") for the purpose of facilitating local market entry by AT&T.<sup>1</sup>

2. My responsibilities also include managing the business relationship between AT&T and SBC (and its subsidiaries, including Ameritech) for all local issues. AT&T

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<sup>1</sup> For the purpose of this Joint Declaration, unless otherwise specifically indicated, we will use the term "SBC" to refer to Illinois Bell, Indiana Bell, Ohio Bell, and Wisconsin Bell.

is currently providing local exchange service through the UNE platform (“UNE-P”) to residential customers in seven SBC states, and business local service in nine SBC States. In Illinois and Ohio, for example, AT&T has been purchasing unbundled network elements from SBC for more than a year to provide business and residential local services.

3. The team that I currently manage interfaces with internal AT&T operational teams dedicated to provisioning AT&T local services. In AT&T Consumer Services, for example, our primary stakeholders include the Product Management organization, which oversees the bundled local product that AT&T is offering in Michigan and other SBC States. My team also partners with the CIO systems organization that manages the integrated systems platform and interfaces with SBC and other external suppliers (such as vendors of inside wire and providers of voice mail). Finally, my team facilitates regularly scheduled conference calls between SBC’s LSC and LOC centers and AT&T Customer Care Organizations.

4. I hold a Bachelor of Arts degree from the University of Michigan in Ann Arbor, and a Master of Management degree from the Kellogg School of Business at Northwestern University. I have been with AT&T since 1982. In the course of my career, I have worked in various local exchange supplier management positions and in a wide variety of engineering and finance positions. In 1995, I managed AT&T’s Total Services Resale and Loop Resale operational discussions with SBC. In 1996, I was Program Manager - Negotiations Support in AT&T’s Central States region. In that position, I was responsible for supporting the executive team that led AT&T’s interconnection negotiations with SBC and provided subject matter expertise on a number of local issues. In addition, from late 1996 until April 1999, I also acted as AT&T’s primary contact with Pacific on all operations support system and operational issues associated with AT&T’s market entry in the state of California.

5. My name is Walter W. Willard. I am the District Manager for OSS Local Services for AT&T's SBC LSAM Organization. In this position, I have responsibility for the business relationship with SBC to support AT&T's plans for local service market entry and for negotiations with Ameritech, Pacific, SWBT, and SNET to facilitate such market entry.

6. I am in frequent contact with policymakers at Ameritech's parent corporation, SBC, regarding a multitude of local issues that bear on activities in our region. I have similar responsibilities in California, Texas, Missouri, Oklahoma, Kansas and Arkansas with respect to Pacific and SWBT. In addition to these responsibilities, I have represented AT&T as a primary member of the California OSS Third Party Test – Test Advisory Board.

7. I am a graduate of the University of San Francisco, where I received a Bachelor of Science degree in Business Administration. I also received a Master of Science degree in Telecommunications from Golden Gate University in San Francisco. I have been employed by AT&T since 1981. In the course of my employment at AT&T, I have held various positions in the Engineering, Operations, OSS Research and Development, International, and Outsourcing areas.

8. Each of us has previously testified on behalf of AT&T in various regulatory proceedings, including the proceedings before this Commission involving SBC's applications for Section 271 authority in California, Missouri, Arkansas, and Michigan. In addition, each (or both) of us has testified in Section 271 proceedings before State commissions in Michigan, California, Missouri, Arkansas, Oklahoma, Illinois and Kansas.

9. Among the matters that each of us has personally focused on in our respective positions are SBC's operations support systems ("OSS") relating to the provisioning of UNEs to AT&T. Each of us is actively involved with various SBC teams that are responsible

for working with AT&T as a local service provider. Among the teams or organizations at SBC with which we (and members of our organization) have frequent -- sometimes daily -- contact are:

- SBC's account teams assigned to AT&T;
- SBC OSS systems representatives;
- SBC's Local Service Centers ("LSC") and Local Operations Centers ("LOC"); and
- SBC project teams implementing various systems, operational and engineering changes within SBC in its various regions, including the Ameritech region.

Through SBC's AT&T Account Team, we are also in frequent contact with policymakers at SBC regarding a multitude of issues that bear on local service.

## **I. PURPOSE AND SUMMARY OF DECLARATION**

10. The purpose of this Declaration is to respond to SBC's claim that it is providing the nondiscriminatory access to OSS required by the Telecommunications Act of 1996 ("the 1996 Act") and the Commission's orders.<sup>2</sup> Contrary to SBC's assertions, SBC is not currently meeting its OSS obligations.

11. First, as discussed in Part II, SBC's loop provisioning processes are deficient for new UNE-P installations. Because of these deficiencies, SBC sends AT&T an order confirmation even though it has not actually delivered a working loop. As a result, AT&T dispatches its inside wire vendors to the premises only to find that the loop has no dial tone; the

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<sup>2</sup> See, e.g., Brief in Support of Application By SBC For Provision of In-Region, InterLATA Services in Illinois, Indiana, Ohio, and Wisconsin, filed July 17, 2003, at 54, 58, 60, 72 ("Application"); Joint Affidavit of Mark Cottrell and Beth Lawson Regarding Operations Support Systems, ¶¶ 5-6 ("Cottrell/Lawson Aff.").

result is substantial delay in providing service to the customers, as well as increased costs to AT&T in the form of “unproductive truck roll” charges and unlawful non-recurring charges.

12. Second, as discussed in Part III, SBC is unreasonably denying AT&T the ability to establish a disaster recovery plan for its operations in the Ameritech region, by unreasonably refusing to provide an IP address.

13. Third, as discussed in Part IV, outages have constantly occurred on SBC’s CORBA pre-ordering interface, causing substantial disruptions in AT&T’s operations. The occurrence and duration of these outages belie SBC’s contention that its systems are “robust and reliable,” and that CORBA is “consistently available when scheduled.”<sup>3</sup>

14. Fourth, as discussed in Part V, SBC has failed to provide CLECs with timely post-to-bill notifications (otherwise known as billing completion notices) and cannot post orders to its billing systems in a timely manner. All too often, SBC has provided such notices late – or has not provided them at all. The delayed or missing notices put AT&T at a distinct competitive disadvantage by, *inter alia*, impeding AT&T’s ability to promptly fill subsequent change orders for customers (while, in the interim, SBC can take advantage of the delay to encourage the customer to return to SBC).

## **II. SBC’S LOOP PROVISIONING PROCESSES ARE DEFICIENT AND LEAD TO “UNPRODUCTIVE TRUCK ROLLS.”**

15. In the Ameritech region,<sup>4</sup> SBC’s loop provisioning processes are deficient for new UNE-P installations. AT&T has been experiencing a high number of “No Dial Tone”

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<sup>3</sup> See Application at 60; Cottrell/Lawson Aff., ¶ 6.

<sup>4</sup> AT&T discovered this problem after it filed reply comments in connection with SBC’s Michigan application. The deficiency described herein exists in all of the Ameritech states and, indeed, has arisen in the other SBC regions as well.

outages when attempting to complete the provisioning of such orders with AT&T's inside wire vendors. Accordingly, AT&T recently undertook an investigation to determine the root cause of this problem. As described below, AT&T's investigation revealed that SBC is responsible for the vast majority of these outages, causing AT&T to incur significant increased costs associated with the need for multiple inside wire dispatches and unwarranted NRCs, and has led to customer dissatisfaction and cancellations. SBC's processes are discriminatory and violate the checklist.

16. These problems occur in connection with "new" installations of UNE-P service – for example, additional lines or new service to an existing premise (*i.e.*, not new construction). On such orders, it is often the case that SBC has already deployed an existing loop at that end user premises that is available for use but is not currently turned up for service. In these circumstances, the unbundled elements constitute an existing combination; accordingly, SBC processes these orders as a "No Field Work" order (also commonly referred to as a "cut-through" order). In other words, because SBC is supposed to have determined that the combination already exists and the loop has already been deployed, SBC does not perform any physical provisioning work on such orders. Moreover, because SBC does not perform any physical work on these orders, under AT&T's interconnection agreements and other applicable tariffs, SBC is only entitled to charge AT&T the non-recurring charge associated with migration orders; it is not entitled to assess any non-recurring charges for new installations.

17. Moreover, when AT&T sends an order for new UNE-P service to Ameritech, it has no way of determining whether that work will need field work or not.<sup>5</sup> AT&T

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<sup>5</sup> Unlike the pre-ordering interfaces in the SWBT and Pac Bell territories, the Ameritech pre-ordering interfaces do not enable a CLEC to determine whether the order will need field work, because there is no existing combination at the premises requested (*i.e.*, no working service on



simply sends the order over as a “new” UNE-P order. SBC then processes the order and sends AT&T a Service Order Confirmation (SOC). As SBC readily acknowledges, the fact that SBC has sent a SOC means that it has delivered a working loop to AT&T and AT&T can then send its contractor to the customer’s premises to complete the necessary inside wire work.

18. AT&T has found, however, that the inside wire technicians have been unable to complete the provisioning of the service in a high percentage of cases, because when they arrived at the location they found that the loop had no dial tone. Inside wire vendors refer to this as an “unproductive truck roll” and charge AT&T approximately \$200 each time it occurs. Thus, AT&T is forced to issue a trouble ticket to SBC, and SBC then dispatches its own technicians to correct the problem and to establish a dial tone. After SBC has responded to the trouble ticket, AT&T must then re-dispatch its inside wire vendor to the location to perform the provisioning work that it was originally dispatched to perform.

19. In April and May alone, AT&T had 683 unproductive truck rolls in Illinois, Michigan, and Ohio.<sup>6</sup> Because of the high number of unproductive truck rolls month after month, AT&T conducted a joint analysis with SBC in an effort to determine the root cause behind the problem. AT&T’s and SBC’s analysis compared the April and May tickets provided to AT&T’s inside wire vendor that resulted in unproductive truck rolls with the corresponding trouble tickets sent to SBC. In doing so, AT&T and SBC were able to associate the explanation provided by SBC as to the cause of the trouble ticket with the unproductive truck rolls.

20. Attachment 2 hereto provides, in pie chart form, the results of that analysis. As the charts show, approximately 20-25% of these unproductive truck rolls were  

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premise (“WSOP”).

<sup>6</sup> See Attachment 1 hereto. In June, the number of unproductive truck rolls for those three states

coded as “placed jumper.” Another 32-34% were coded as facilities problems, and another 18-26% were attributable to “no ticket,” meaning that AT&T had not opened a trouble ticket with SBC after the inside wire vendor could not complete its work because, in many instances, the customer had cancelled its order after the unproductive truck roll.<sup>7</sup> Each of these categories raised significant concerns for AT&T, and AT&T raised these concerns with its SBC account team.

21. SBC has confirmed in recent meetings with AT&T that the classification “placed jumper” means that at some point in the physical make-up of the circuit a pair of wires needed to be installed to complete the circuit. It also confirmed that in these cases, the order should not have been worked as a “cut-through” – in other words, SBC issued a SOC without delivering a fully functional loop. Thus, after receiving a trouble ticket from AT&T, in order to establish dial tone, SBC had to dispatch its technicians to deploy a cross-connect (usually at either the NID or inside the building, although SBC has indicated that in some instances central office work was required). Similarly, SBC admitted that most of the trouble tickets generated from no field work orders that were closed to facilities problems indicated that SBC had not delivered a fully functional loop to AT&T. As one SBC representative put it, “we rolled the dice,” meaning that they gambled that the loop that was assigned was a service-ready cable and pair with continuity from the switch port to the NID.

22. To make matters worse, AT&T has recently confirmed that SBC is in fact charging AT&T the new installation non-recurring charge on such orders, even though it is not actually performing the work that those charges are designed to recover. The imposition of

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climbed to 709.

<sup>7</sup> Some of the remaining categories of troubles are traceable to problems with either AT&T’s or

NRCs on cut-through orders clearly violates TELRIC principles, and AT&T's interconnection agreements with SBC agreements make clear that SBC is not entitled to charge the NRCs associated with installation for currently combined elements; rather, SBC is limited to charges for the records changes associated with such orders.<sup>8</sup> AT&T estimates that in April and May of 2003 alone, these improper non-recurring charges amounted to almost \$235,000 in Illinois, Ohio, and Michigan.<sup>9</sup> *See* Attachment 1.<sup>10</sup>

23. These outages have a substantial anticompetitive impact. Such “unproductive truck rolls” cost AT&T approximately \$200 per occurrence, in addition to other costs. For example, AT&T has experienced a large number of unproductive truck rolls associated with the “placed jumper” and “facilities” categories in Illinois, Ohio, and Michigan each of the last three months, with a dramatic increase in June.<sup>11</sup> In April, AT&T experienced 126 unproductive truck rolls in Illinois, 42 in Ohio, and 27 in Michigan. In May, AT&T had another 87 unproductive truck rolls in Illinois, 31 in Ohio, and 59 in Michigan. And in June the numbers increased to 167 in Illinois, 104 in Ohio, and 113 in Michigan.<sup>12</sup> The amount that

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its inside wire vendor's systems, and AT&T is taking steps to correct those problems.

<sup>8</sup> *See, e.g.*, Michigan Agreement § 9.3.2.1; Wisconsin Agreement § 9.3.2.1; Indiana Agreement § 9.3.2.1; Ohio Agreement, Appendix to Article IX and Schedule 9.3, § 3.2 and 3.3; Illinois Commerce Commission Docket No. 98-0396, Order (October 2001) (establishing that only migration charge owed for new UNE-P).

<sup>9</sup> AT&T does not yet have the performance measurement raw data from SBC that would enable it to estimate the amount of the NRCs that were inappropriately assessed in June.

<sup>10</sup> Attachment 1 hereto provides a breakdown of AT&T's calculations by month for each state. In addition, all of these estimated costs are for AT&T's consumer services only; the totals will increase once AT&T has an opportunity to quantify the costs relating to AT&T's business services.

<sup>11</sup> AT&T focused its analysis on these three states because its consumer UNE-P entries in Indiana and Wisconsin are relatively recent.

<sup>12</sup> Because AT&T has not performed a joint review of the June data with SBC, AT&T has assigned unproductive truck rolls to the “placed jumper” or “facilities” categories based on May

AT&T spent on this unproductive truck rolls, in these three months alone, totals \$135,865. The chart below provides a breakdown of these expenses by state.

	<u>April</u>	<u>May</u>	<u>June</u>
Illinois	\$22,426.93	\$15,570.30	\$29,702.04
Ohio	\$6677.33	\$4865.40	\$16,504.20
Michigan	\$5466.12	\$11,838.82	\$22,814.39

24. Moreover, this is not the only harm to AT&T. SBC also charges AT&T for unproductive truck rolls associated with some of these tickets.<sup>13</sup> Furthermore, the end user impact is substantial. The customer is dissatisfied because it does not receive service on the promised due date, and continues without service during the entire period in which SBC is correcting the problem so that AT&T can finish its work and sometimes repeat trouble tickets are needed to install working service. Moreover, in many cases, as demonstrated by the “no ticket” instances identified above, the customer simply changes his mind and drops the requested service rather than continuing to wait for service to be provisioned. In such instances, AT&T suffers not only lost revenues for those customers, but injury to its reputation in the marketplace as well.

25. These problems have also led SBC to report incorrect results for several performance measures. For example, SBC should have reflected each instance in which it did not deliver a working loop on the date the SOC was issued as a missed due date under PM 28, but has not. Notably, had SBC reflected these orders as having missed the due date, it would have missed the benchmark for Illinois in June. *See* Attachment 3. Moreover, it is likely that

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allocations.

<sup>13</sup> AT&T knows, for example, that SBC charges AT&T for those truck rolls which SBC codes as “no trouble found,” and may be assessing charges in connection with other unproductive truck rolls. AT&T is trying to get data from SBC in order to determine the impact of these errors.

some trouble tickets associated with these outages that were initially coded “no trouble found” were excluded under PM 35 (Percent Trouble Reports Within 30 Days (I-30) of Installation) and PM 37 (Trouble Report Rate).<sup>14</sup>

26. In short, SBC’s processes on cut through orders are discriminatory because they force AT&T to incur unnecessary expenses that SBC does not incur for itself and result in application of non-TELRIC based NRCs. SBC has the obligation to deliver a working loop at the time it issues the SOC on the order requesting such loop. Its “roll of the dice” unlawfully places the risk that the loop will require additional work to make it functional and foists on competitors unnecessary expenses that put it at a competitive disadvantage with SBC. For all of these reasons, SBC’s processes for ordering and provisioning new UNE-P lines is deficient, anticompetitive, and violates its checklist obligation to provide nondiscriminatory access to loops.

### **III. SBC IS UNREASONABLY DENYING AT&T THE ABILITY TO ESTABLISH A DISASTER RECOVERY PLAN.**

27. SBC is also unreasonably denying AT&T the ability to establish a disaster recovery plan for its operations in the Ameritech region, which is inconsistent with both the checklist and the public interest.

28. Many of the servers that support the local services that AT&T offers to consumers throughout the Ameritech region (and elsewhere) are physically located in the Midwest. AT&T is in the process of establishing a disaster recovery plan for these services, in the event that a disaster should render the servers in the Midwest inoperable. If such a disaster

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<sup>14</sup> AT&T has not yet reconciled PM 35 with SBC to determine the number of trouble tickets that were erroneously coded as NTFs.

were to occur, AT&T's plan calls for shifting this traffic to servers located in the Southeast. In order to accomplish this shift, however, SBC would have to establish a unique IP address in its systems.

29. Accordingly, to implement this plan, AT&T recently asked SBC to populate its router and firewall with an IP address that would be devoted to AT&T's disaster recovery plan. Although SBC agreed to establish the additional IP address in the SWBT and Pacific Bell regions, it flatly refused to do so in the Ameritech region. SBC contends that its policy and the Uniform and Enhanced OSS Plan of Record (POR) limit AT&T to three production IP addresses, and AT&T has already established three production IP addresses for business purposes in the Ameritech region.<sup>15</sup>

30. SBC's insistence on limiting CLECs to three IP addresses is itself unreasonable; no other BOC attempts to limit the number of IP addresses a CLEC can obtain. For example, AT&T has established 13 IP addresses in the Verizon East region, 12 in Verizon West, 14 in BellSouth, and 11 in Qwest's region. Indeed, prior to the implementation of the POR, AT&T had established numerous IP addresses with SBC. Thus, there are no relevant technical limitations on the ability to establish additional IP addresses for uses such as disaster recovery.

31. Moreover, it is infeasible to establish a workaround solution in the absence of obtaining an IP address from SBC. Indeed, in the spring of 2002, AT&T collaborated with SBC to test a method called network address translation, which is a method that would allow a

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<sup>15</sup> SBC agreed to provide an IP address in the SWBT and Pacific Bell regions because in those states AT&T has established only two IP addresses; therefore, AT&T still has one IP address available in those regions even under SBC's cramped view of its obligations under the interconnection agreements.

carrier to use a limited number of IP addresses as if it in fact had more. The trial was unsuccessful, however, because it essentially doubled AT&T's response and processing times on a variety of transactions. Accordingly, the only feasible means of implementing AT&T's disaster recovery plan is to obtain an additional IP address from SBC.

32. Denying AT&T the ability to establish a disaster recovery plan is not only discriminatory and anticompetitive, it would be contrary to the public interest. If AT&T's servers were struck by a disaster, AT&T would effectively be unable to offer and support consumer services in the Ameritech region. Not only would AT&T have to implement its recovery plan, but, in the midst of the disaster AT&T would also have to negotiate with SBC to determine how quickly it could get a replacement IP address so that OSS connectivity could be restored. With the additional IP address that AT&T is requesting, AT&T would be able to re-establish service using its Southeastern servers within hours. Without it, AT&T might be unable to provide service for an unnecessarily extended period of time. Indeed, even if SBC were subsequently to agree to establish an IP address for AT&T in the event of an actual emergency, SBC's normal process for establishing an IP address is 10 business days.

33. SBC's refusal is also discriminatory, because it undoubtedly would not deny such capabilities to itself, if SBC determined that its own disaster recovery needs required it. And if anything, the events of September 11, 2001, which damaged a significant amount of telecommunications equipment (including AT&T facilities) in New York, have dramatically underscored the strong public interest in adequate planning for backup capabilities in the event of an emergency. For all of these reasons, SBC's position is starkly unreasonable and violates the checklist.

**IV. SBC DOES NOT PROVIDE NONDISCRIMINATORY ACCESS TO PRE-ORDERING FUNCTIONS.**

34. Outages on the CORBA pre-ordering interface have been a problem in SBC's OSS for nearly a year – but SBC has yet to resolve the problem. Between October through December 2002, CORBA experienced a dramatic increase in outages that frequently rendered AT&T unable to perform some, or all, pre-ordering functions. For example, the number of impacted user minutes ("IUMs") due to CORBA outages in the Ameritech region increased from zero in August and September to 11,845 in October, 9,470 in November, and 8,733 in December. By contrast, AT&T experienced no IUMs in the Verizon region, and only 3,951 IUMs in the BellSouth region, from October through December.<sup>16</sup>

35. In February 2003, CORBA again experienced substantial outages in the Ameritech region. During February, five separate outages occurred on CORBA on five different days. These five outages represented the highest number of outages that had occurred on CORBA during a given month since May 2002. Furthermore, the number of IUMs in February 2003 was 8,471 – almost the same total as that for December 2002. The 8,471 IUMs for February 2003 in the Ameritech region were higher than the combined total for BellSouth, Verizon, SWBT, and Pacific for that month. *See* Attachment 4 hereto. For the 13-month period from January 2002 through February 2003, the total number of IUMs attributable to outages was far higher in the Ameritech region than in the BellSouth, Verizon, SWBT, or Pacific regions.<sup>17</sup>

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<sup>16</sup> *See* Attachment 4 hereto. IUMs measure the amount of time during which AT&T representatives are unable to access the CORBA interface while they are on-line and attempting to assist end-user customers.

<sup>17</sup> During this 13-month period, the number of IUMs attributable to outages were 45,204 in the Ameritech region, 8,156 in the BellSouth region, 11,366 in the Verizon region, 9,854 in the SWBT region, and 25,278 in the Pacific region.



36. These outages were not unique to AT&T. As SBC acknowledged in this Commission's proceeding on its previous application for Section 271 authority in Michigan, WorldCom complained to SBC of outages on the EDI pre-ordering interface between November 2002 and January 2003.<sup>18</sup> WorldCom reported in its reply comments in the same proceeding that it had experienced six additional pre-ordering outages in February 2003 – and SBC acknowledged that it had “put more monitoring devices in place” in response to such complaints.<sup>19</sup>

37. From March through May 2003, outages continued to occur on CORBA, but at a lower level than in previous months. The number of IUMs decreased to 1,683 in March, rose to 4,786 in April, and then fell to only 452 in May. *See* Attachment 4 hereto.

38. In June 2003, however, substantial outages on CORBA resumed. During that month, six outages occurred – the highest number since February. Furthermore, the number of IUMs due to outages in June was 11,640, which was approximately the same as that in October. *Id.* Three of the outages in June were between *72 and 105 minutes* in duration.

39. Moreover, substantial outages continued in July. The number of IUMs totaled 8,350 for that month – only slightly below the level experienced in December and February. Furthermore, the number of outages (six) remained the same in July as in June. *Id.* The duration of three of the outages ranged from *82 to 94 minutes*; the remaining three outages were between 23 and 28 minutes long.

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<sup>18</sup> *See* Joint Reply Declaration of Mark Cottrell and Beth Lawson filed in WC Docket No. 03-16, ¶ 85.

<sup>19</sup> *See id.*, ¶¶ 85-86; Reply Comments of WorldCom, Inc., filed in WC Docket No. 03-16, at 15.

40. The pattern of outages has continued this month. On August 4, 2003, AT&T experienced *two* separate outages on CORBA. The first outage was one hour in length. When the second outage occurred later that afternoon, and AT&T reported it to SBC, SBC responded that it could give no estimated time of repair. Ultimately, the second outage lasted for *two hours and 21 minutes*.

41. SBC has admitted that the recent outages on CORBA were due to deficiencies in its OSS. In late July 2003, AT&T discussed with SBC the outages that had been occurring on CORBA during that month. On July 31, 2003, SBC advised AT&T that the outages recorded by AT&T were “rooted in SBC’s systems,” but were unrelated.<sup>20</sup> In an electronic mail message that it sent on August 4, SBC similarly stated that the outages were due to “several intermittent issues which SBC addressed,” not to a “chronic recurring issue.” Although SBC asserted that it “takes the appropriate steps necessary to maintain and monitor the pre-order environment,” the two outages that occurred on CORBA on the very same day show that SBC has not eliminated the root cause of the disruptions.<sup>21</sup> Indeed, on August 4 and 5, 2003,

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<sup>20</sup> See electronic mail message from Walter W. Willard to Becky Krost (SBC), dated July 31, 2003 (attached hereto as Attachment 5). The CORBA outages that occurred in July 2003 may also have been due, at least in part, to SBC’s unsuccessful attempt to upgrade its pre-order translation software, which was intended to improve pre-order response times. Following the implementation of the new software on July 14, 2003, CLECs advised SBC that the pre-order responses that they were receiving were inaccurate. Because of these problems, SBC removed the upgrade and restored the preexisting translator on July 19, 2003. See Pre-Order Processing Timeliness Plan – SBC Midwest Status Report, filed July 31, 2003, in MPSC Case No. U-12320, at 3. AT&T did not experience an outage during July until July 17 – after the SBC had implemented the flawed new version of the translator.

<sup>21</sup> See electronic mail message from Becky Krost (SWBT) to Walter W. Willard, dated August 4, 2003 (Attachment 6 hereto); electronic mail message from Walter W. Willard to Becky Krost, dated August 4, 2003 (Attachment 7 hereto).

SBC representatives advised AT&T that SBC was still working on determining the root cause of the outages.

42. The frequency and levels of SBC's most recent outages stand, once again, in stark contrast to the pre-ordering interfaces offered by other RBOCs, and even to the pre-ordering interfaces offered in SBC's other regions. In June and July 2003, the combined level of IUMs in the Ameritech region (19,990) was higher than that for BellSouth and for SBC's other BOCs, SWBT and Pacific Bell. Similarly, the number of outages experienced in the Ameritech region exceeded not only that of any other RBOC (including SWBT and Pacific Bell) in both June and July, but also the combined *total* number of outages experienced by other BOCs during July. Finally, for the 12-month period from August 2002 through July 2003, the total number of IUMs attributable to outages was far higher in the Ameritech region than in the BellSouth, Verizon, SWBT, or Pacific regions.<sup>22</sup>

43. The substantial occurrences of outages in the Ameritech region from October through December, followed by a resumption of such outages in February 2003 and from June 2003 to date, simply demonstrate the instability of SBC's OSS. Periods of substantial outages are followed by one or more months of "lulls," only to be followed by a recurrence of the problem. The outages that have occurred in the Ameritech region since June constitute one of the longest and most extreme, pattern of outages that AT&T has experienced to date. The recent outages rank in severity with those that AT&T experienced in July 2002, and during the third quarter of 2002.

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<sup>22</sup> See Attachment 4 hereto. In June and July 2003, BellSouth had a total of 385 IUMs, and SWBT and Pacific had a total of 1,788 and 13,787 IUMs, respectively. Verizon had *no* IUMs during those two months. *Id.*

44. The frequency of outages on CORBA, by itself, has impaired AT&T's ability to submit orders expeditiously to SBC. The accurate completion of an LSR requires AT&T to use the address validation function and the customer service query function of the pre-ordering interfaces. When outages occur, AT&T cannot retrieve customer information using these functions. Thus, as the result of an outage on CORBA, either AT&T will lose the customer's business (because the customer is unwilling to wait until access to the OSS has been restored to place the order) or provisioning of the customer's service may be delayed, again to the annoyance of the customer. Explaining to prospective or existing customers that the information needed to complete their order is currently inaccessible due to computer problems is obviously a poor use of a representative's time, to say the least. Moreover, given the large number of its service representatives, AT&T also suffers a substantial loss in productivity when these representatives must sit idle because the interface is unavailable.<sup>23</sup> In such circumstances, AT&T and other CLECs are being denied a meaningful opportunity to compete.

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<sup>23</sup> Because numerous AT&T representatives must sit idle during any outage, the data that SBC reports for PM 4 (OSS Interface Availability) does not adequately measure the impact of an outage on AT&T. *See* Application at 60 (alleging 99.50 percent availability reported under PM 4 for two of the last three months). As AT&T has previously demonstrated in connection with the Commission proceeding involving SBC's first Section 271 application for Michigan this year, the measured results in PM 4 are skewed. For example, PM 4 measures outages by interface, not by transaction type – and therefore does not capture those outages where only certain pre-ordering queries become unavailable. Moreover, because the data reported under PM 4 are an average, they obscure the effect of outages on particular CLECs. Some outages may affect a small number of CLECs, and some CLECs (particularly large-volume CLECs such as AT&T) may be more adversely affected by outages than others. Finally, SBC's determination of outages for purposes of PM 4 are highly subjective judgments. *See, e.g.*, Joint Declaration of Sarah DeYoung and Walter W. Willard (¶ 55) and Joint Supplemental Declaration of Sarah DeYoung and Walter W. Willard (¶ 99) in WC Docket No. 03-16.

Because of the deficiencies in PM 4, AT&T has consistently maintained that only data such as IUMs reflect the true impact of an outage because IUMs measure the amount of time during which AT&T representatives are unable to access the CORBA interface which they are on-line and attempting to assist end-user customers. Contrary to the suggestion that SBC made in

45. SBC may respond, as it did in the *Michigan I* proceeding, that its data reported under PM 4 on interface availability describe only a small number of hours of down time on CORBA, even during the months when AT&T's data show a substantial number of IUMs. But AT&T's own data show that, even in terms of the hours of downtime, the outage problem is significant. Those data show that AT&T experienced 13.5 hours of outages on CORBA during the last three months of 2002, and approximately 4.4 hours of time in February 2003. Similarly, the total durations of CORBA outages that AT&T experienced in June and July 2003 were 364 minutes (6.1 hours) and 384 minutes (6.4 hours), respectively.

46. Even these data on total downtime do not reflect the adverse effect of outages on AT&T. Large CLECs such as AT&T employ numerous service representatives to take customer orders and submit LSRs to SBC. In a single hour, these representatives perform thousands of pre-ordering transactions. Thus, if the pre-ordering systems experience "only" six or seven hours of outages in a single month, those outages prevent AT&T from submitting significant volumes of transactions to SBC. As previously noted, this leads to delays in provisioning for a significant number of customers, or loss of those customers' business altogether.

47. The unavailability of CORBA to AT&T's service representatives during outages imposes significant costs on AT&T. AT&T Laboratories estimates that, for each IUM, AT&T incurs \$1.50 in costs. Using that estimate, AT&T has incurred more than \$98,000 in costs for the 65,430 IUMs that it has experienced during the last 12 months. *See Attachment 4.*

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proceedings involving its previous Section 271 application for Michigan, the IUM figures that AT&T has calculated do not include downtime resulting from internal issues on AT&T's side of the gateway. The IUMs calculated by AT&T, and described in this Declaration, are due exclusively to outages on SBC's side of the interface.

During June and July alone, when AT&T experienced 19,990 IUMs due to CORBA outages, the cost to AT&T was approximately \$30,000.

48. The adverse impact of CORBA outages is also reflected in defects per million (“DPMs”), which is a standard quality approach used by AT&T and other companies to measure the defects in a process and, in the case of OSS, to measure the failure rate associated with application design.<sup>24</sup> For purposes of this standard, a defect is an interval of scheduled uptime during which one or more components of the technology used by AT&T is unavailable to any user. A low level of DPMs indicates that the company is operating at a high efficiency level.

49. AT&T’s ultimate, long-range goal is for all of its facilities to operate at no more than 500 DPMs for all of the applications that it uses. This target is the level at which AT&T would expect to be operating if it achieved maximum efficiency. However, this target obviously will take some time to achieve, because as of mid-July AT&T’s DPM level attributable to SBC interface issues was approximately 60,000 in the Ameritech region. Thus, for the near term, AT&T has set more attainable, but less ambitious, targets that are minimally acceptable levels of efficiency. For example, AT&T’s objective is to reduce the total number of DPMs to 35,000 by the end of 2003. A level of 60,000 DPMs is clearly far short of even that goal.

50. The deficiencies in SBC’s OSS, however, are a major cause of DPMs – and therefore make it significantly more difficult for AT&T to achieve even its near-term goals.

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<sup>24</sup> AT&T is in the process of shifting all of its system availability metrics from IUMs to DPMs so that it can better manage overall system availability and the individual components of availability, including the contribution to DPMs made by the SBC OSS interface. Not all of the systems used by AT&T in the provisioning of local service have moved yet to the new DPM metrics. Currently, AT&T Business Services systems use DPM, while AT&T Consumer Services systems use IUMs.

Prior to the last week of July, AT&T's DPM level was approximately 60,000. However, the outages that occurred on CORBA during the last week of July substantially increased that level, to approximately 80,000 DPMs. Stated otherwise, the increase in DPMs caused by recent CORBA outages has caused a correspondingly significant reduction in AT&T's efficiency, thereby increasing AT&T's costs.

51. A CLEC does not have a meaningful opportunity to compete when it is frequently denied the use of its pre-ordering interface – and when, as has occurred during June and July, the duration of those outages is as long as 90 minutes (or more). Under these circumstances, SBC cannot reasonably be found to be in compliance with its OSS obligations.

**V. SBC DOES NOT PROVIDE TIMELY AND COMPLETE BILLING COMPLETION NOTICES AND CANNOT POST ORDERS TO ITS BILLING SYSTEMS IN A TIMELY MANNER.**

52. As part of its required showing that it meets its OSS obligations under Section 271, SBC must demonstrate that it “provides competing carriers with order completion notices in a timely and accurate manner.” *New York 271 Order*, ¶ 187. That requirement reflects the Commission's recognition that order status notices are an “important aspect of a competing carrier's ability to serve its customer at the same level of quality as a BOC.” *New Jersey 271 Order*, ¶ 93.

53. SBC, however, has failed to generate timely billing completion notices (“BCNs”) – otherwise known as post-to-bill notifications (“PTBs”) – due to deficiencies in its OSS. Because SBC takes so long to transmit BCNs, or fails to transmit BCNs at all, AT&T has been forced to design an automated “workaround” to reduce the competitive harm that would otherwise have resulted. Even with the implementation of the workaround, AT&T remains at a competitive disadvantage.

54. CLECs in the Ameritech region first became able to receive BCNs last year, when SBC implemented LSOG 5 (the only version on which SBC sends BCNs). AT&T and other CLECs fought long and hard for the BCN functionality that SBC finally included in LSOG 5 because, as discussed below, a BCN eliminates the “guesswork” involved in determining whether orders have posted to SBC’s billing system and, as a result, reduces the rejection rate that AT&T and other CLECs experience on subsequent order activity on a particular account. AT&T migrated its systems to LSOG 5, in part, because of the availability of BCNs on that version of EDI.

55. SBC’s performance in sending BCNs to users of LSOG 5, however, has been inadequate and unstable. In January 2003, for example, SBC failed to send tens of thousands of BCNs to AT&T in response to orders that AT&T sent via LSOG 5. SBC, which acknowledged that this problem occurred due to defects in its OSS, waited for nearly two months after discovering the defect before it advised CLECs that a problem even existed.<sup>25</sup> SBC did not begin to transmit the missing BCNs to AT&T until February 3, 2003, and only because AT&T requested that SBC do so.

56. In addition to its failure to send these thousands of “missing” BCNs to AT&T in January, SBC advised AT&T that it had withheld nearly 10,000 other BCNs from AT&T for the files for the period between January 20 and January 27, 2003, until SBC had completed its “reconciliation” process. As SBC admits in its Application, it did not provide advance notice of this practice to AT&T.<sup>26</sup>

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<sup>25</sup> See Accessible Letter No. CLECAM03-008, dated January 29, 2003.

<sup>26</sup> See Cottrell/Lawson Aff., ¶ 125 (conceding that SBC’s November 21, 2002, Accessible Letter “could have included notification to the CLECs that the new service order activity would not post to CABS during the reconciliation process”). SBC asserts that it did not “withhold” or



57. SBC's failure to transmit timely BCNs did not end in January. In an Accessible Letter dated April 7, 2003, SBC revealed that it had failed to deliver more than 14,000 BCNs to CLECs. Those problems were, once again, due to defects in SBC's systems. SBC's Application attributes the omissions to the failure of "a manual effort to transfer and load" a file of service orders, and to "a failure to capture posted service orders for some broadband types for PTB processing."<sup>27</sup>

58. During the May 14-22, 2003, time frame, SBC failed to deliver approximately 107,500 BCNs, almost all of which were for UNE-P orders.<sup>28</sup> SBC states that the problem was due to its "failure to properly document and test a software patch that was intended only to eliminate invalid 'mismatch' errors appearing on internal reports."<sup>29</sup> SBC did not send the missing BCNs to the CLECs until May 23.<sup>30</sup>

59. Although AT&T would prefer to receive and use BCNs, AT&T has decided for now to forego its reliance on BCNs because SBC's performance in providing BCNs has been so inadequate. Instead, AT&T has reverted back to its previous practice of waiting for a certain amount of time after receipt of the SOC before releasing subsequent orders, in the hope

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"block" BCNs during the reconciliation process, but simply "prevent[ed] new service order activity from posting to CABS during the course of the reconciliation." *Id.*, ¶ 124. SBC is making a distinction without a difference. By preventing new service orders from posting to CABS, SBC prevented BCNs from being created and transmitted to the CLECs.

<sup>27</sup> See Accessible Letter No. CLECAM03-028, dated April 7, 2003 (Application, App. J, Tab 39); Cottrell/Lawson Aff., ¶ 127.

<sup>28</sup> See Accessible Letter No. CLECAM03-037 (Application, App. J, Tab 40); Accessible Letter No. CLECAM03-041 (Application, App. J, Tab 41); Cottrell/Lawson Aff., ¶¶ 128-129.

<sup>29</sup> Cottrell/Lawson Aff., ¶ 128.

<sup>30</sup> *Id.*, ¶ 129.

that, in the interim, previous orders on the end-user's account will have posted to the billing systems and thus the subsequent orders can be processed without rejection. AT&T's "workaround" is discussed below.

60. SBC has asserted that its prior failures to send BCNs were due to a variety of causes. However, a major cause of the problem is clearly the unduly long time that SBC takes to post service orders to its billing systems – a step that must be completed before a BCN is issued.<sup>31</sup>

61. SBC has effectively conceded that its process of posting service orders is unduly lengthy. As Ms. DeYoung and Ms. Tavares describe in greater detail in their Joint Declaration, SBC rejected AT&T's proposal that SBC implement in the Ameritech region the same standard for PM 17.1 (95% within 5 business days) to govern the timeliness of posting that SBC has already implemented in Texas. Instead, SBC has advised AT&T that "the best it can do" is 95% within 10 days, due to the nature of the systems in the Ameritech region. No other RBOC needs as long as Ameritech does to post orders to its billing systems. Verizon, for example, has agreed to return 95% of its BCNs within two days of the provisioning order completion notice (*i.e.*, the SOC).<sup>32</sup> Similarly, Pacific Bell and Qwest have agreed to intervals of 3 days and 5 days, respectively. All of those intervals are far shorter than the 10-day interval that SBC is willing to accept in the Ameritech region.

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<sup>31</sup> See Cottrell/Lawson Aff., ¶ 123 (stating that SBC's LASR system will generate a BCN only after it receives notification that all service orders related to the LSR have posted to the billing system).

<sup>32</sup> Copies of Verizon's business rules for OR-4-17 (percent of BCNs sent within 2 business days) and of SBC's business rules for PM 17.1 in Texas are attached hereto as Attachments 8 and 9, respectively.

62. The failure of SBC to send timely BCNs, and SBC's inability to post orders in a timely manner to its billing systems, have caused significant competitive harm to AT&T. SBC's poor performance, for example, has: (1) impeded AT&T's ability to submit subsequent orders (change orders) for its customers; (2) denied AT&T the ability to determine precisely when it can properly begin billing a customer; and (3) impaired AT&T's ability to update the customer care data in its own systems. Each of these consequences will be examined in turn.

63. Because a service order needs to post to SBC's billing systems before the end-user is treated by SBC's OSS as an AT&T customer, AT&T is effectively unable to send a subsequent order on the same end-user's account (such as an order to add, delete, or change a feature) until posting has occurred. Without the BCN, which provides confirmation to the CLEC posting has occurred, AT&T must effectively guess as to when the order has posted or risk order rejection, since SBC's posting process is so lengthy.

64. The submission of a subsequent order on an end-user's account is a common practice in the industry. Customers often contact AT&T to request additional features that they inadvertently did not include in their original order or service, or later decided to add to the services that they previously requested AT&T to provide. Alternatively, after placing its initial order, a customer might request AT&T to delete a feature that the customer ordered (because the customer changed his or her mind), or to make some other changes to its account. At any given time, change orders represent approximately 1 to 2 percent of all of AT&T's accounts.

65. In order to be competitive with SBC, a CLEC needs the same ability as SBC to submit change orders, and to have those orders provisioned with the same timeliness,

accuracy, and reliability that SBC experiences in its retail operations. The failure of SBC to send a BCN and to post orders to its billing system in a timely manner, however, puts CLECs at a significant competitive disadvantage. Unlike CLECs, SBC's retail operations do not need to receive BCNs or guess as to when orders have posted to SBC's billing systems. SBC's retail representatives have direct, real-time access to such information. Thus, when a retail customer requests the addition or deletion of a feature, the SBC retail representative can determine, while the customer is on the line, whether the preexisting order has posted and has passed through the legacy systems. As a result, SBC can implement the customer-desired change on the date requested by the customer.<sup>33</sup>

66. By contrast, the failure of SBC to provide a timely BCN is likely to force a CLEC to delay the submission of a subsequent order for an end-user, and the provisioning of the changes that the customer desired. Such delay not only inconveniences the customer, but harms the reputation for quality service that a CLEC needs to compete in the marketplace. Thus, if AT&T cannot add a service on the date that the customer requested, the customer is likely to question AT&T's ability to provide quality service—and may well switch back to SBC.

67. In fact, AT&T has recently learned that SBC is pursuing winback activities on AT&T's customers between the time that the SOC has been issued and the order has posted to SBC's billing systems. This became apparent when AT&T learned that one of its customers in Michigan had been contacted by SBC during this interval, and that SBC does not refrain from winback activity during this period. SBC's retail representatives are able to contact the customer and urge it to switch back to SBC because they learn of the customer's migration to

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<sup>33</sup> SBC has declined to specify whether its retail operations encounter the same posting delays between ACIS (its provisioning system) and its retail billing systems as CLECs face between ACIS and CABS.

AT&T from the line loss notification which SBC's retail operations receive – in real time – after the migration occurs. Thus, although AT&T is unable to respond promptly to a customer's change order because of the posting and BCN delays caused by SBC's deficient OSS, SBC can try to win back that customer, who may well be irritated that AT&T cannot promptly implement its change order and decide to accept SBC's offer.

68. In addition to impeding AT&T's ability to send change orders efficiently and successfully, SBC's delays in posting and in transmitting BCNs prevent AT&T from ensuring that it is accurately billing a customer who has migrated from SBC. As this Commission has stated, BCNs advise CLECs that they "can begin to bill the customer for service."<sup>34</sup> Unless and until it receives a timely BCN, however, AT&T has no means of determining with certainty the date on which it may properly begin billing the customer.

69. Finally, SBC's delays in posting service orders and transmitting BCNs have impeded AT&T's ability to maintain up-to-date "customer care data" in its own systems. When it migrated to LSOG 5, AT&T modified its own systems so that the data concerning a particular customer in those systems will be updated *only* after AT&T has received a BCN on the LSR (or subsequent order) that it placed for the customer – and therefore has received confirmation that all SBC activities associated with the customer's order have been completed. For example, if the customer requests a change in the features or services that it had been taking from SBC, those changes will not be reflected in AT&T's systems until after the BCN has been received.

70. Because SBC's performance in providing BCNs has been so inadequate, AT&T determined that it could reduce the competitive harm resulting from that performance

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<sup>34</sup> See, e.g., *New Jersey 271 Order* ¶ 93; *Pennsylvania 271 Order* ¶ 43.

only if it designed its LSOG 5 systems to “stack” its change orders (much like airplanes waiting for release by air traffic control) until a suitable period of time had elapsed before their submission to SBC. By “stacking” the change orders, AT&T hoped to reduce the risk that the change orders would be rejected, even if the BCN had not yet arrived.

71. Thus, AT&T has incurred approximately \$81,000 in systems investment to implement an automated “workaround” that, in effect, enables AT&T to “force complete” an order in the absence of a BCN so that AT&T’s orders will continue to move through the provisioning process. As part of this design, AT&T’s systems “stack” a change order for a certain amount of time, and then automatically send the change order to SBC. The \$81,000 required to develop and implement this workaround is in addition to the investment that AT&T made to modify its systems to receive and process BCNs.

72. Although the automated “workaround” has reduced the frequency of rejections of AT&T’s change orders, AT&T still suffers substantial competitive harm as a result of SBC’s failure to transmit BCNs in a timely manner. First, because SBC (by its own admission) can take 10 days to return a BCN, a large number of change orders are still rejected, even after they have been “stacked” for a number of days, on the ground that the customer is not listed in SBC’s OSS as an AT&T customer.

73. Second, using the “workaround” forces AT&T to maintain an exceptionally large number of stacked orders. These delays in processing customer change orders still translate directly into degraded customer service. The customer may have requested, for example, to add caller ID or to change the number of rings before call answering picks up. When AT&T is unable promptly to respond to such a request, the customer will likely place the

blame on AT&T – and even switch back to SBC (particularly if SBC makes a “winback attempt” during the delay) – even though the SBC is the actual cause of the delay.

74. Third, SBC’s lengthy delays in posting service orders to its billing systems still significantly affect the timeliness (and therefore the accuracy) of SBC’s wholesale bills. This, in turn, directly impacts the auditability of the wholesale bill and imposes costs on AT&T and other CLECs that attempt to undertake a verification of the accuracy of the bills.

75. Finally, as described above, SBC’s delays continue to impair AT&T’s ability to bill its customers accurately and to maintain current customer care data. These problems impede AT&T’s efforts to maintain the reputation for quality service which is essential to compete effectively in the local exchange market.

76. SBC claims that it takes “very seriously” its obligation “with regard to timely and accurate delivery of [BCNs].”<sup>35</sup> SBC’s sentiments, however, cannot compensate for its inadequate performance. By failing to send BCNs and to post orders to its billing systems in a timely manner, SBC has impeded AT&T’s ability to send change orders, jeopardized AT&T’s relationship with its customers, and forced AT&T to develop a workaround in order to reduce the negative consequences resulting from BCN delays. These consequences are both unreasonable and discriminatory, because there is no evidence that SBC’s retail operations or SBC’s customers face comparable delays. The disparities in SBC’s performance preclude any finding that SBC has provided the nondiscriminatory access to OSS that is required by the competitive checklist.

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<sup>35</sup> Cottrell/Lawson Aff., ¶ 130.

**VERIFICATION PAGE**

I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

/s/ Sarah DeYoung  
Sarah DeYoung

Executed on: August 6, 2003



**VERIFICATION PAGE**

I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

/s/ Walter Willard  
Walter Willard

Executed on: August 6, 2003

## ATTACHMENT 1

**NRC AND UNPRODUCTIVE TRUCK ROLL ANALYSIS  
AT&T CONSUMER  
APRIL 2003**

STATE	NFW LINES WITH LSR INDICATORS = N <sub>1</sub>	NRC	ESTIMATED NRC CHARGES THAT SHOULD HAVE BEEN WAIVED
IL	2,058	\$20.21	\$41,592.18
MI	822	\$17.82	\$14,648.04
OH	1,139	\$33.88	\$38,589.32
<b>TOTAL</b>	<b>4,019</b>		<b>\$94,829.54</b>

1 Source: SBC raw data for AT&T

STATE	# UNPROD TRUCK ROLLS	% UNPROD TRUCK ROLLS/SBC RESPONSIBLE <sub>1</sub>	# UNPROD TRUCK ROLLS/SBC RESPONSIBLE <sub>1</sub>	UNPROD TRUCK ROLL CHG (AT&T IW VENDOR)	ESTIMATED \$ FOR UNPRODUCTIVE TRUCK ROLLS/SBC RESPONSIBLE
IL	220	57.27%	126	\$178	\$22,426.93
MI	66	41.00%	27	\$202	\$5,466.12
OH	66	63.63%	42	\$159	\$6,677.33
<b>TOTAL</b>	<b>352</b>		<b>195</b>		<b>\$34,569.38</b>

1 Currently includes 'placed jumper' and 'facility' cause codes only

# **NRC AND UNPRODUCTIVE TRUCK ROLL ANALYSIS** **AT&T CONSUMER** **MAY 2003**

STATE	NFW LINES WITH LSR INDICATORS = N*	NRC	ESTIMATED NRC CHARGES THAT SHOULD HAVE BEEN WAIVED
IL	2,862	\$20.21	\$57,841.02
MI	1,404	\$17.82	\$25,019.28
OH	1,680	\$33.88	\$56,918.40
<b>TOTAL</b>	<b>5,946</b>		<b>\$139,778.70</b>

\* Source: SBC raw data for AT&T

STATE	# UNPROD TRUCK ROLLS	% UNPROD TRUCK ROLLS/SBC RESPONSIBLE*	# UNPROD TRUCK ROLLS/SBC RESPONSIBLE*	UNPROD TRUCK ROLL CHG (AT&T IW VENDOR)	ESTIMATED \$ FOR UNPRODUCTIVE TRUCK ROLLS/SBC RESPONSIBLE
IL	184	47.54%	87	\$178	\$15,570.30
MI	96	61.05%	59	\$202	\$11,838.82
OH	51	60.00%	31	\$159	\$4,865.40
<b>TOTAL</b>	<b>331</b>		<b>177</b>		<b>\$32,274.52</b>

\* Currently includes 'placed jumper' and 'facility' cause codes only

# NRC AND UNPRODUCTIVE TRUCK ROLL ANALYSIS

## AT&T CONSUMER

### JUNE 2003

STATE	NFW LINES WITH LSR INDICATORS = N <sub>1</sub>	NRC	ESTIMATED NRC CHARGES THAT SHOULD HAVE BEEN WAIVED
IL	Not Yet Available	\$20.21	Not Yet Available
MI	Not Yet Available	\$17.82	Not Yet Available
OH	Not Yet Available	\$33.88	Not Yet Available
<b>TOTAL</b>	Not Yet Available		Not Yet Available

1 Source: SBC raw data for AT&T

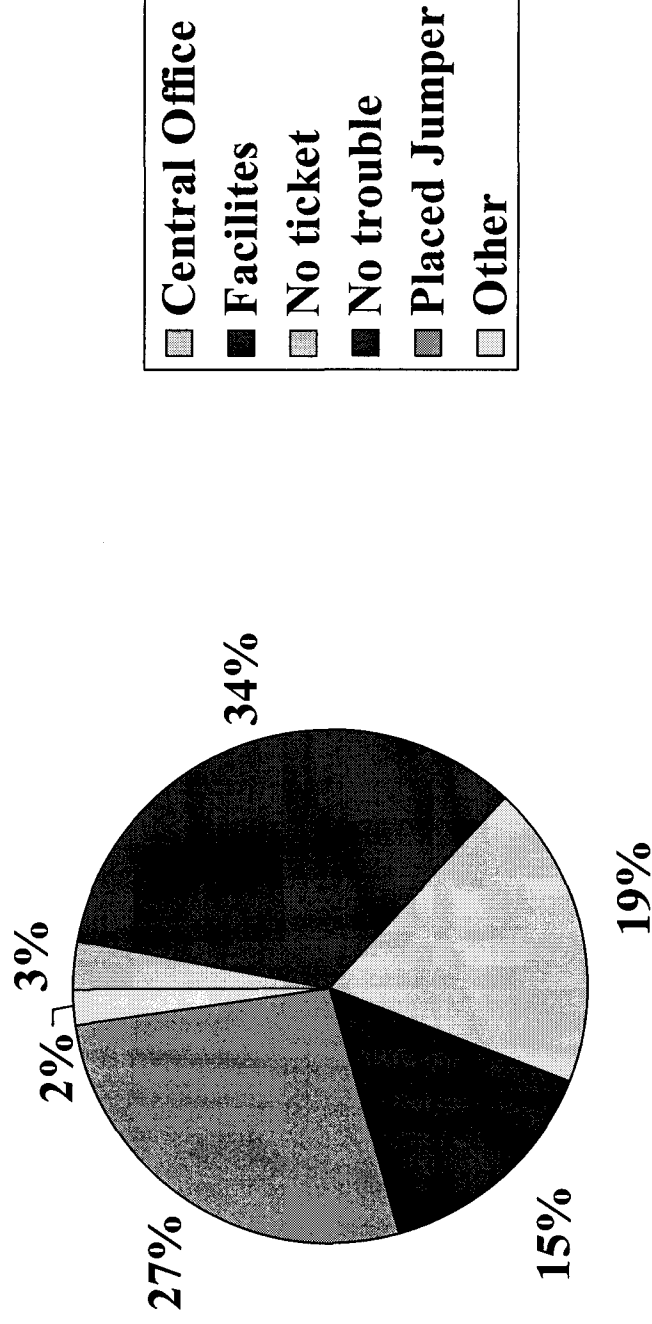
STATE	# UNPROD TRUCK ROLLS	% UNPROD TRUCK ROLLS/SBC RESPONSIBLE <sup>1,2</sup>	# UNPROD TRUCK ROLLS/SBC RESPONSIBLE <sup>1</sup>	UNPROD TRUCK ROLL CHG (AT&T IW VENDOR)	ESTIMATED \$ FOR UNPRODUCTIVE TRUCK ROLLS/SBC RESPONSIBLE
IL	351	47.54%	167	\$178	\$29,702.04
MI	185	61.05%	113	\$202	\$22,814.39
OH	173	60.00%	104	\$159	\$16,504.20
<b>TOTAL</b>	709		384		\$69,020.63

1 Currently includes 'placed jumper' and 'facility' cause codes only

2 Estimate based on unreconciled data for June, percentages used from May

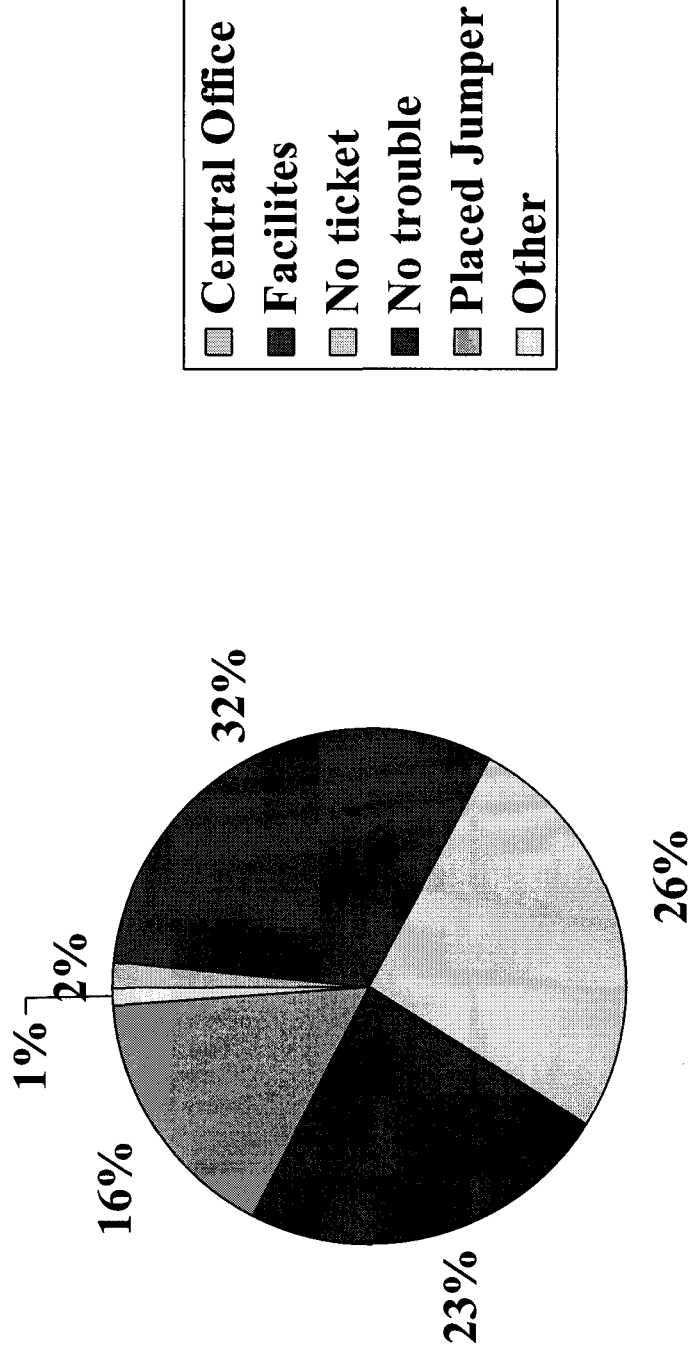
## ATTACHMENT 2

# Michigan – May 2003



95 orders researched

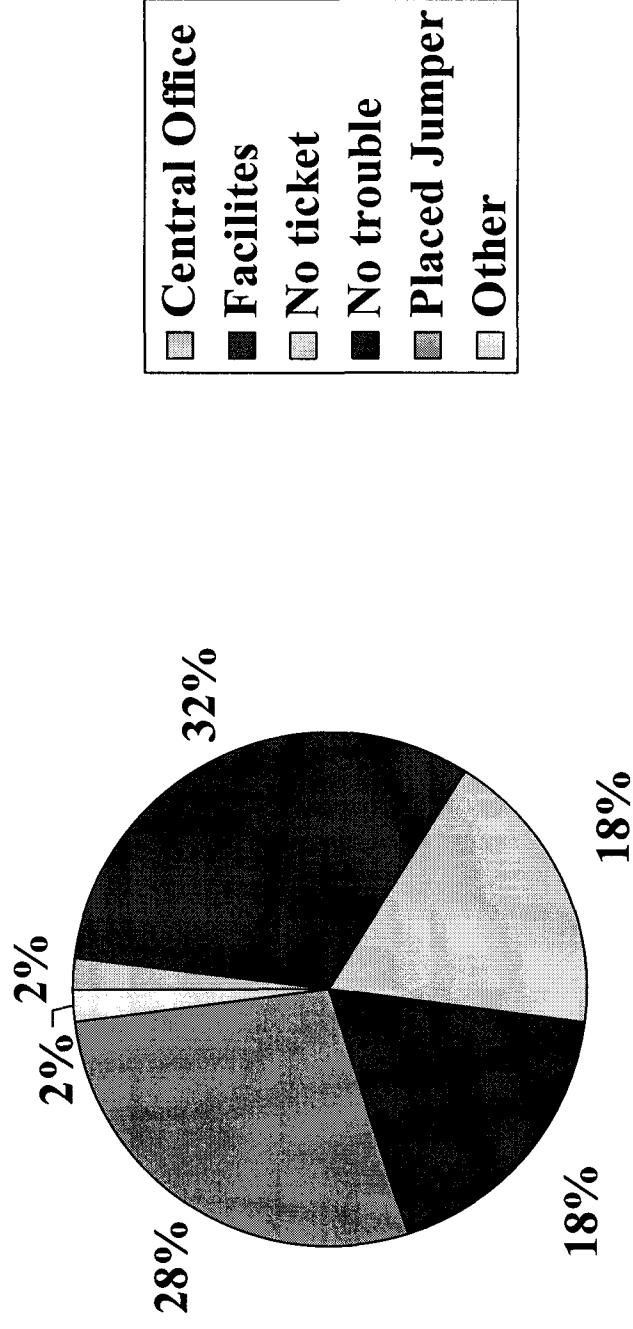
# Illinois – May 2003



183 orders researched



# Ohio – May 2003



50 orders researched

## ATTACHMENT 3

**PM 28 PERCENT NO FIELD WORK ORDERS COMPLETED BY CUSTOMER  
REQUESTED DUE DATE  
APRIL, MAY, AND JUNE 2003 AT&T CONSUMER RESULTS**

APRIL					
STATE	SBC DEN	SBC NUM	SBC REPORTED RESULTS	AT&T ADJ NUM	AT&T ADJ RESULT
IL	39,242	38,977	99.32%	38,757	98.76%
MI	33,362	33,222	99.58%	33,156	99.38%
OH	38,376	38,206	99.56%	38,140	99.39%

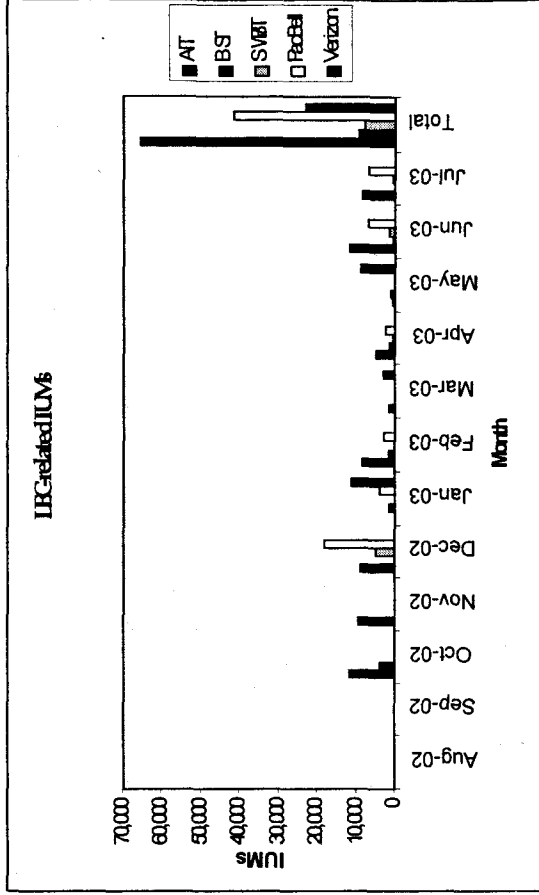
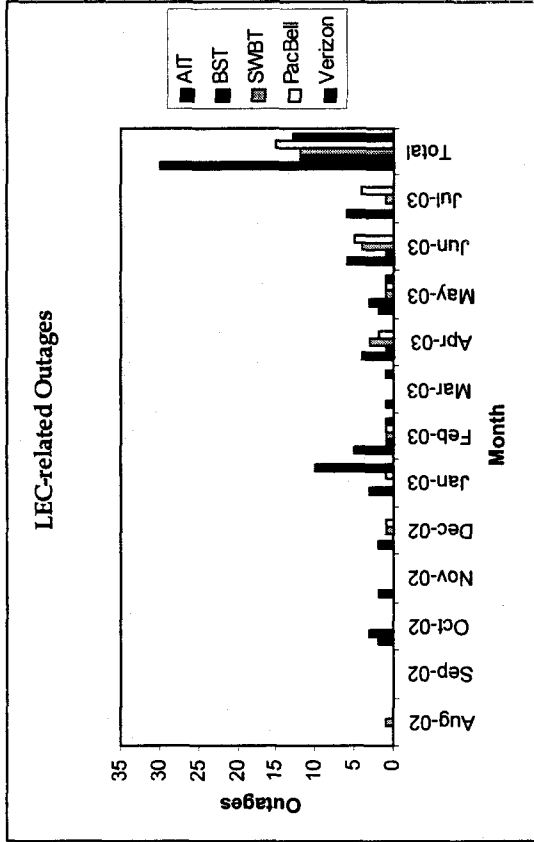
MAY					
STATE	SBC DEN	SBC NUM	SBC REPORTED RESULTS	AT&T ADJ NUM	AT&T ADJ RESULT
IL	38,035	37,796	99.37%	37,612	98.89%
MI	33,669	33,530	99.59%	33,434	99.30%
OH	36,720	36,394	99.11%	36,343	98.97%

JUNE					
STATE	SBC DEN	SBC NUM	SBC REPORTED RESULTS	AT&T ADJ NUM	AT&T ADJ RESULT
IL	21,040	20,681	98.29%	20,330	
MI	30,660	30,484	99.43%	30,299	98.82%
OH	37,268	37,042	99.39%	36,869	98.93%

## ATTACHMENT 4



# ILEC Pre-Order Outages



	Aug-02	Sep-02	Oct-02	Nov-02	Dec-02	Jan-03	Feb-03	Mar-03	Apr-03	May-03	Jun-03	Jul-03	Total
AIT	Outages	0	0	2	2	0	5	1	4	2	6	6	30
	IUMs	0	0	11,845	9,470	0	8,471	1,683	4,786	452	11,640	8,350	65,430
BST	Outages	0	0	3	0	3	1	0	1	3	1	0	12
	IUMs	0	0	3,951	0	1,301	1,412	0	1,484	1,008	385	0	9,541
SWBT	Outages	1	0	0	0	0	1	0	3	1	4	1	12
	IUMs	6	0	0	0	0	214	0	732	1	1,288	490	7,788
PacBell	Outages	0	0	0	0	1	1	0	2	1	5	4	15
	IUMs	0	0	0	0	4,047	3,030	0	2,425	238	7,036	6,751	41,728
Verizon	Outages	0	0	0	0	10	1	1	0	1	0	0	13
	IUMs	0	0	0	0	11,161	205	3,062	0	8,732	0	0	23,160
Total	Outages	1	0	5	2	14	9	2	10	8	16	11	82
	IUMs	6	0	15,796	9,470	16,509	13,332	4,745	9,427	10,431	20,349	15,591	147,647

## ATTACHMENT 5

> From: Willard, Walter W (Walt), CSLSM [mailto:wwillard@att.com] <mailto:  
[mailto:wwillard@att.com]>  
> Sent: Thursday, July 31, 2003 8:04 PM  
> To: KROST, BECKY (SWBT)  
> Cc: HARVEY, THOMAS AIIIS (AIT); Deyoung, Sarah, CSLSM; Webber, Rebecca L,  
> CSLSM; SBC CMP  
> Subject: SBC Pre-Order Platform instability  
>  
>  
>

> Becky,  
>

> AT&T Business and AT&T Consumer EDI gateways have experience pre-order  
> outages on 7/25, 7/28, 7/30 and 3 seperate incidents on 7/31. In each of  
> these incidents the outages were recorded to be 25 minutes or more in  
> duration affecting one or more pre-order functions. These incidents reflect  
> a level of instability in SBC's pre-order interface that poses a serious  
> business disruption on AT&T's ability to conduct business in all SBC  
> regions.  
>

> Earlier today, Melonie Temple and Brian Letson explained that the various  
> incidents recorded by AT&T were rooted in SBC's systems and appear to be  
> unrelated. This latest incident that occurred after Brian and Mel shared the  
> results of their inquiry, really highlights the need for SBC to take action  
> to restore stability to the pre-order platform.  
>

> I am seeking your personnel involvement to ensure that SBC has carefully  
> analyzed and corrected each occurrence of pre-order outage and that every  
> effort is expended to restore the pre-order platform to stability. The  
> present level of performance is intolerable. I will appreciate hearing from  
> you as to what new corrective action SBC is taking.  
>

> Thank you,  
>

> Walt Willard  
>  
>

> APPLICATION.....: LOS  
> FACTORY(S) IMPACTED.....: 'ACS LOC ORDER'  
> APPLICATION OUTAGE DURATION.....: 71 MINUTES  
> TICKET NUMBER.....: 20030731-263694  
> [http://infoctr.ims.att.com/library/ticketdisp.asp?p\_tkt\_number=20030731  
> -263694]  
> AFFECTED COMPONENT.....: LOS-MKT@ILL-SALES  
> START DATE/END DATE.....: 07-31-03 04:13 PM EDT /  
> 07-31-03 05:24PM EDT  
>  
>  
>

## ATTACHMENT 6



> From: KROST, BECKY (SWBT) [mailto:rb1648@sbc.com] <mailto:  
[mailto:rb1648@sbc.com]>  
> Sent: Monday, August 04, 2003 3:05 PM  
> To: Willard, Walter W (Walt)  
> Cc: HARVEY, THOMAS AIIS (AIT); Deyoung, Sarah; Webber, Rebecca L;  
SBC CMP; TEMPLE, MELONIE (SWBT)  
> Subject: RE: SBC Pre-Order Platform instability  
>

> << File: SBC JULY OUTAGES\_080403.xls >> Walt,  
>

> Attached is a spreadsheet detailing what corrective action was taken by SBC  
> for each of the outages AT&T reported concerning different pre-order items.  
> After researching the information again with a higher level of granularity,  
> SBC came to the same conclusion as Melonie Temple and Brian Letson outlined  
> in their email on 7/31 - no chronic recurring issue was identified. There  
> were, however, several intermittent issues which SBC addressed, all  
> occurring in several different layers within the various applications.  
>

> SBC remains vigilant to ensure that what might appear as an independent  
> problem does not become a recurring issue. We continually monitor our  
> systems and constantly refine and enhance our capability to detect system  
> issues quickly. While we understand the frustration experienced whenever  
> systems must be restarted, SBC takes the appropriate steps necessary to  
> maintain and monitor the pre-order environment.  
>

> SBC will continue to work with its IT partners and ensure that appropriate  
> resources and systems support are available to timely resolve any issue that  
> may arise. If you have any further questions or concerns, please don't  
> hesitate to contact me.  
>

Date	AT&T Application Impacted	SBC Application Impacted	Regions Impacted	Transaction Types Impacted	Duration	Start time	End time	Related Ticket #	ICA
7/17/03	ACS/LNIE	CORBA	AIT, PBC	ADDR. Val. &CSR	58	4:02 PM	5:00 PM		OBF adapter - process hung after a restart of another system, the system with hung process was restarted to regain connectivity and resolved issue.
7/25/03	ABS/ECIP3	CORBA	Ameritech, SWBT, PacBell	CSR	27	6:00 PM	6:27 PM	11608724	back office - hung process in creating delay in responses going out, CORBA services were restarted.
7/28/03	ACS/LNIE	CORBA	AIT	CSR	23	5:23 PM	5:46 PM	same as below TT# 11620171	Same issue as below as no other outage was reported, and the time frames overlap, the problem described in TT# 11620171 did not prevent all transactions from working.
7/28/03	ABS/ECIP3	CORBA	Ameritech, SWBT, PacBell	CSR	39	5:26 PM	6:05 PM	11620171	CORBA - logging issue caused processing to be degraded. CORBA services were bounced to clear issue.
7/30/03	ABS/ECIP3	CORBA	Ameritech, SWBT, PacBell	CSR	47	4:37 PM	5:24 PM	11638594	NA - issue cleared on it's own, no systems were restarted to clear issue.
7/31/03	ACS/LNIE	CORBA	ALL	CSR	94	10:04 AM	11:38 AM	same as below TT# 11642214	same issue as described below
7/31/03	ABS/ECIP3	CORBA	Ameritech, SWBT, PacBell	CSR	45	10:15 AM	11:00 AM	11642214	Middleware - hung process in middleware application, application restarted cleared problem.
7/31/03	ACS/LNIE	CORBA	PBC	ADDR. Val.	71	4:13 PM	5:24 PM	11647113	Middleware - This ticket's root cause was a hung process in a middleware application, the application was restarted and transactions began flowing again.
7/31/03	ACS/LNIE	CORBA	AIT, PBC	CSR	28	2:13 PM	2:41 PM	same as below TT# 11645785	same issue as described below
7/31/03	ABS/ECIP3	CORBA	Ameritech, SWBT, PacBell	CSR	27	2:21 PM	2:48 PM	11645785	OBF adapter - CSI service was determined to not be responding, service restarted in OBF layer which cleared issue.

## ATTACHMENT 7

> From: Willard, Walter W (Walt)  
> Sent: Monday, August 04, 2003 5:32 PM  
> To: KROST, BECKY (SWBT)  
> Cc: HARVEY, THOMAS AIIS (AIT); Deyoung, Sarah; Webber, Rebecca L; SBC CMP;  
TEMPLE, MELONIE (SWBT)  
> Subject: RE: SBC Pre-Order Platform instability

>  
> Becky,

> Thank you and I understand there was yet another 1 hour pre-order outage again today. While  
the problems may not be what SBC would define as > '> chronic> '> because they occur in > '>  
several different layers within various applications> '> , the disruption to AT&T> '> s business is  
indeed chronic and unacceptable. Apart from Ameritech having the poorest performing systems in  
the nation, something seems to have occurred within the last week and a half that is contributing to  
daily outages of significant impact across all SBC regions. SBC must continue to examine your data  
to identify and eliminate the root cause of these disruptions.

>  
> Please continue your investigations.

>  
> Walt  
>

## ATTACHMENT 8

<b>Function:</b>		
<b>OR-4 Timeliness of Completion Notification</b>		
<b>Definition:</b>		
Refer to the <i>Definition</i> listed next to each OR-4 sub-metric (OR-4-11, OR-4-16, and OR-4-17) for a description of the measurement included in the sub-metrics.		
<b>Exclusions:</b>		
<ul style="list-style-type: none"> <li>Verizon Test Orders</li> <li>Orders not received through the Verizon NetLink EDI system. This includes orders transmitted manually, orders received through the VAN EDI system, and orders submitted through the WEB GUI.</li> <li>VADI orders</li> <li>Special Project PONs (if applicable) per the process documented in Appendix S.</li> <li>Sub-metric OR-4-11 <i>only</i> includes the following additional exclusion: Any product that is not designed to generate a PCN and a BCN.</li> </ul>		
<b>Performance Standard:</b>		
<p><b>For sub-metric OR-4-11:</b> 0.25% of PONs that received neither a PCN nor a BCN within two (2) business days from the SOP posting of the provisioning of the last service order associated with a specific PON.</p> <p><b>For sub-metric OR-4-16:</b> 95% of PCNs sent within one (1) business day.</p> <p><b>For sub-metric OR-4-17:</b> 95% of BCNs sent within two (2) business days.</p>		
<b>Report Dimensions</b>		
<b>Company:</b> <ul style="list-style-type: none"> <li>CLEC Aggregate <sup>1</sup></li> <li>CLEC Specific</li> </ul>		<b>Geography:</b> <ul style="list-style-type: none"> <li>New York</li> </ul>
<b>Sub-Metrics Timeliness of Completion Notification</b>		
<b>OR-4-01 through OR-4-10</b>	<b>Metrics Not in Use in Verizon North</b>	
<b>OR-4-11</b>	<b>% Completed orders with neither a PCN nor BCN sent</b>	
<b>Description</b>	<p>The percent of EDI PONs for which the last service order has been <i>provisioning completed</i> in the Verizon Service Order Processing (SOP) system. The elapsed time begins with the Provisioning completion in SOP of the last service order associated with a specific PON. The PCN and the BCN are considered sent when the Verizon Netlink system initiates the send of the completed notifier to the CLEC. The notifier is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to transmission to the CLEC. If no PCN and no BCN have been sent in two (2) business days after <i>provisioning completion</i>, the order will be captured here in this measure.</p>	
<b>Products</b>	<p>CLEC Aggregate:</p> <ul style="list-style-type: none"> <li>EDI</li> </ul>	
<b>Calculation</b>	<b>Numerator</b>	<b>Denominator</b>
	Number of EDI PONs completed that have produced neither a PCN nor a BCN within two (2) business days after the last service order has been updated as <i>provisioning completed</i> in SOP.	Total number of EDI PONs for which the last service order has been updated as <i>provisioning completed</i> in SOP in a month.

<sup>1</sup> Excludes Verizon Advanced Data Incorporated

Sub-Metrics Timeliness of Completion Notification, continued		
OR-4-12 through OR-4-15	Metrics Not in Use in Verizon North	
OR-4-16	% Provisioning Completion Notifiers sent within one (1) Business Day	
Description	The percent of EDI Provisioning Completion Notifiers (PCNs) sent within one business day of work order completion (WFA completion date) in the Verizon Service Order Processing (SOP) system. The elapsed time begins with the Provisioning completion in the Verizon SOP system of the last service order associated with a specific PON. The PCN is considered sent when the Verizon Netlink system initiates the send of the completed notifier to the CLEC. The notifier is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to the transmission to the CLEC. The PCNs shall be considered to be timely if Verizon provides them within one business day of the Work Order Completion (WFA completion date) in SOP.	
Products	CLEC Aggregate: • EDI	
Calculation	Numerator	Denominator
	Number of EDI PONs completed that produce a PCN within one (1) business day after Work Completion in WFA.	Total number of EDI PONs for which the last service order has been updated as <i>provisioning completed</i> in the Service Order Processor (SOP) in a month.
OR-4-17	% Billing Completion Notifiers sent within two (2) Business Days	
Description	The percent of EDI Billing Completion Notifiers (BCNs) sent within two (2) business days of the provisioning order completion in the Verizon SOP system. The elapsed time begins with the completion in the Verizon SOP system of the last service order associated with (provisioning) a specific PON. The BCN is considered sent when the Verizon Netlink system initiates the send of the completed notifier to the CLEC. The notifier is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to transmission to the CLECs. The BCNs shall be considered to be timely if Verizon provides them within two (2) business days of the Order Completion in SOP.	
Products	CLEC Aggregate: • EDI	
Calculation	Numerator	Denominator
	Number of EDI PONs completed that produce a BCN within two (2) business days after SOP provisioning completion update.	Total number of EDI PONs for which the last service order has been updated as <i>provisioning completed</i> in the Service Order Processor (SOP) in a month.

## ATTACHMENT 9



<b>17.1 Measurement</b>	
Service Order Posting	
<b>Definition:</b>	
Percentage of service orders posting within five business days of service order completion.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• Access Service Orders billed through CABS</li> <li>• Interconnection Trunk Orders</li> </ul>	
<b>Business Rules:</b>	
<p>This measure includes all SORD orders and is created from the Posted Service Order Database (PSOD). This measurement will determine percentage of service orders that post to CRIS of CABS billing system within 5 business days of service order completion. This measurement would include all SORD orders produced as a result of an LSR request (i.e., C, N, and D wholesale orders). The base for this measure is the total number of SORD service orders that post in a given month.</p>	
<b>Levels of Disaggregation:</b>	
<ul style="list-style-type: none"> <li>• None</li> </ul>	
<b>Calculation:</b>	<b>Report Structure:</b>
Percentage of service orders posting within five business days of service order completion.	Reported by CLEC and all CLECs
<b>Measurement Type:</b>	
Tier 1 – Low Tier 2 – Medium	
<b>Benchmark:</b>	
95% Service orders posted within 5 days of service order completion with no allowance for critical-z 85% Service Orders posted within 3 days of service order completion with no allowance for critical-z.	